

Aleksandr Felstiner  
Levy Ratner, P.C.  
80 8<sup>th</sup> Ave., 8<sup>th</sup> Fl.  
New York, NY 10011  
212-627-8100  
[afelstiner@levyratner.com](mailto:afelstiner@levyratner.com)  
Bar: 281906  
*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE  
DIVISION

CHEYNE ANDERSON, JESUS CASTELLANO,  
HANNAH MIRZA, KATHLEEN O'BEIRNE, SETH  
TAYLOR, WILLIAM VAN DER LAAR, MARK  
WESLEY DUDLEY, RACHEL WESTRICK, JIAJUN  
XU, INDIVIDUALLY AND ON BEHALF OF ALL  
OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:25-cv-03268-BLF

**JOINT STIPULATION  
REGARDING ADJOURNMENT  
OF HEARING ON  
DEFENDANT'S MOTION TO  
DISMISS**

Class Action

Date:

Time:

Dept.:

Judge: Hon. Beth Labson Freeman

Pursuant to Local Rule 6-2, Plaintiffs Cheyne Anderson, Jesus Castellano, Hannah Mirza, Kathleen O'Beirne, Seth Taylor, William Van Der Laar, Mark Westley Dudley, Rachel Westrick, and Jianjun Zu ("Plaintiffs"), and Defendant Google LLC ("Defendant") (collectively, the "Parties") stipulate and respectfully request that the Court enter an order adjourning the oral argument scheduled for September 18, 2025 on Defendant's Motion to Dismiss (ECF No. 22). The Parties make this request in light of Plaintiff's Motion for Leave to Amend (ECF No. 31).

WHEREAS, Plaintiffs filed their Complaint on April 11, 2025 (ECF No. 1.);

WHEREAS, Plaintiffs filed their Amended Complaint on April 17, 2025 (ECF No. 8.);

WHEREAS, Defendant filed its Motion to Dismiss the Amended Complaint on June 16, 2025, seeking dismissal of each and every cause of action in the Complaint, as well as dismissal of the class allegations (ECF No. 22.);

WHEREAS, the Parties submitted a Joint Stipulation with Briefing Schedule on June 24, 2025 (ECF No. 25), which the Court approved as modified on June 25, 2025 (ECF No. 26);

WHEREAS, the hearing on the pending Motion to Dismiss is set for September 18, 2025;

WHEREAS, Plaintiffs filed a Motion for Leave to Amend on September 10, 2025 (ECF No. 31);

WHEREAS, and the [Proposed] Second Amended Complaint would add five additional plaintiffs and include additional pleaded facts (*Id.*);

WHEREAS, the Court's decision on Plaintiffs' pending Motion for Leave to Amend could result in the filing of a new complaint;

WHEREAS, the Parties agree that all rights and arguments of either Party on Defendant's pending Motion to Dismiss are reserved;

that judicial economy and efficiency may best be served by adjourning the oral argument scheduled for September 18, 2025;

WHEREAS, after conferring, the Parties have not reached a stipulated agreement concerning hearings on the pending motions. Defendant proposes a single, consolidated hearing. Plaintiffs propose that the Motion for Leave to Amend be argued (if necessary) and resolved first.

NOW THEREFORE, the Parties hereby jointly stipulate, agree, and respectfully request an Order as follows:

1. That the hearing on Defendant's Motion to Dismiss scheduled for September 18, 2025 be adjourned.

A Proposed Order is being filed in connection with this Stipulation.

Dated: September 12, 2025

LEVY RATNER, P.C.

Respectfully submitted,

JONES DAY

By: /s/ Aleksandr L. Felstiner  
Aleksandr L. Felstiner

*Attorneys for Plaintiffs Cheyne Anderson,  
Jesus Castellano, Hannah Mirza,  
Kathleen O'Beirne, Seth Taylor, William  
Van Der Laar, Mark Wesley Dudley,  
Rachel Westrick, and Jiajun Xu*

By: /s/ Aaron L. Agenbroad  
Aaron L. Agenbroad  
Liat Yamini  
Wendy C. Butler  
Christian A. Bashi

*Attorneys for Defendant Google LLC*

**ATTESTATION**

I, Aleksandr Felstiner, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel of record for all Parties have concurred in this filing.

/s/ Aleksandr Felstiner

Aleksandr Felstiner